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Attorneys for Plaintiff
Thomas Doughty

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

THOMAS DOUGHTY,

Plaintiff,

v.

PELICAN INVESTMENT HOLDINGS,
LLC d/b/a AUTO SERVICE
DEPARTMENT

Defendant.

Case No.: 8:24-cv-01926-FWS-ADS

**Declaration of Ryan L. McBride in
Support of Plaintiff's Motion for
Default Judgment Against Defendant
Pelican Investment Holdings, LLC
d/b/a Auto Service Department**

Date: January 15, 2026

Time: 10:00 a.m.

Courtroom: 10D, 10th Floor

Hon. Fred W. Slaughter





1 I, Ryan L. McBride, hereby declare under penalty of perjury that the following
2 is true and correct:

- 3 1. I have personal knowledge of the following facts and, if called as a witness,
4 would testify as follows:
- 5 2. I am one of Plaintiff's co-counsel in this action and make this declaration in
6 support of Plaintiff Motion for Default Judgment.
- 7 3. On September 5, 2024, Plaintiff filed the instant action. *See* ECF No. 1.
- 8 4. On September 10, 2024, Plaintiff served Defendant a copy of the summons and
9 complaint in this action. *See* ECF No. 8.
- 10 5. On October 28, 2024, Plaintiff's counsel sent a letter to Defendant. It provided
11 Defendant with the case name, number, and a request for their response.
12 Notably, the letter indicates Plaintiff's intention to proceed with Default
13 Judgment should Defendant choose to remain silent. Plaintiff's counsel mailed
14 this letter to Defendant's registered agent, principal address, mailing address,
15 and former principal address as provided by the California Secretary of State.
- 16 6. Plaintiff's counsel repeatedly tried to engage amicably with Defendant,
17 including contacting previous counsel of Defendant. Plaintiff counsel's
18 attempts to establish lines of communication to settle the care or to generally
19 communicate about any matter related to Plaintiff's claims have been
20 unsuccessful.

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1 I declare under penalty of perjury under the laws of the United States of
2 America and the State of California that the foregoing is true and correct and that this
3 declaration was signed on December 8, 2025, in San Diego, California.

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5 Dated: December 8, 2025

Respectfully submitted,

6 **KAZEROUNI LAW GROUP, APC**

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8 By: /s/Ryan L. McBride
9 Ryan L. McBride, Esq.
10 *Attorneys for Plaintiff*

